

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Application of San Diego Gas & Electric  
Company (U 902 E) For Authority To  
Update Marginal Costs, Cost Allocation,  
And Electric Rate Design

Application 11-10-002  
(Filed October 3, 2011)

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**MOTION OF THE COUNTY OF SAN DIEGO TO INTERVENE  
AND REQUESTING PARTY STATUS**

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Attorneys for COUNTY OF SAN DIEGO

Dated: December 8, 2011

**MOTION OF THE COUNTY OF SAN DIEGO TO INTERVENE  
AND REQUESTING PARTY STATUS**

**I. INTRODUCTION**

Pursuant to Rule 1.4 of the California Public Utilities Commission's Rules of Practice and Procedures, the County of San Diego hereby moves and respectfully requests permission to intervene and requests party status in Application No. 11-10-002, Phase 2 of San Diego Gas & Electric's (SDG&E's) General Rate Case.

**II. DISCUSSION**

Pursuant to Rule 1.4(a)(2), and Rule 1.4(a)(4), a person may become a party to a proceeding by filing a protest or by filing a motion to become a party. The County hereby requests a determination and ruling that County may become a party to the instant proceeding.

The County, its residents, businesses and other public agencies are all customers in SDG&E's service area. Any of these stakeholders that have installed or plan to install distributed generation facilities could be adversely impacted under the proposed rate structure changes and increases requested by SDG&E in Application 11-10-002.

The County has invested substantial capital into solar energy facilities to reduce its energy costs and improve the environment for the benefit of the public. These self-generating facilities were developed subject to, and in reliance on, the existing net energy metering (NEM) tariff structure. Accordingly, the County has an interest in the proposed Network Use Charge, Basic Service Fee and a Prepay Service Option, among other issues.

The County has an interest in the issues raised in the Utility Consumers' Action Network (UCAN) Motion, seeking a preliminary ruling and determining that SDG&E's rate Application design violates Public Utilities law. The County also has an interest in any alternative proposals that may be set forth to address the issues of fairness and sustainability.

### **III. SERVICE**

Service of notices, orders, and other communications and correspondence in the proceeding should include each of the individuals representing the County as a party on the service list as follows:

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### **IV. CONCLUSION**

For the foregoing reasons, the County respectfully requests that the Public Utilities Commission grant the County's requests to intervene and its motion for party status.

Dated: December 8, 2011

Respectfully submitted,

/s/ William A. Johnson, Jr.  
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